



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV 13 2014

**CERTIFIED MAIL 70091680000076636421**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Mr. Dan Weinberger  
Corporate Administration  
Fall River Foundry  
670 South Main Street  
Fall River, Wisconsin 53932

Re: Notice of Violation  
Compliance Evaluation Inspection  
WID006426704

Dear Mr. Weinberger:

On August 20, 2014, a representative of the U.S. Environmental Protection Agency inspected the Fall River Foundry ("FRF") facility located in Fall River, Wisconsin. As a conditionally exempt small quantity generator of hazardous waste, FRF is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate FRF's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by FRF, EPA's review of records pertaining to FRF, and the inspector's observations, EPA has determined that FRF violated RCRA requirements related to universal waste as described below.

Universal Waste Requirements

1. Under Wis. Admin. Code § NR 673.13(4)(a) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must place lamps in a closed, structurally sound container that is compatible with the waste and is not leaking.

FRF is a small quantity handler of universal waste. At the time of the inspection, FRF's container of lamps was not closed or structurally sound.

2. Under Wis. Admin. Code § NR 673.14(5) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste must label or clearly mark each lamp or a container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

At the time of the inspection, FRF's container of lamps was not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."



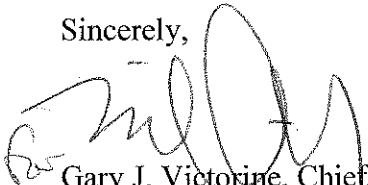
3. Under Wis. Admin. Code § NR 673.16 [40 C.F.R. § 273.16], employees must be trained on the proper handling and emergency procedures appropriate to the types of universal waste handled at the facility.

At the time of the inspection, FRF had not provided training to their employees regarding the management of universal waste.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above universal waste requirements. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at [whitney.brenda@epa.gov](mailto:whitney.brenda@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Matthew Hilse, WDNR, [Matthew.Hilse@wisconsin.gov](mailto:Matthew.Hilse@wisconsin.gov)  
Michael Ellenbecker, WDNR, [Michael.Ellenbecker@wisconsin.gov](mailto:Michael.Ellenbecker@wisconsin.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

**Date of Inspection:** August 20, 2014

**Facility Name:** Fall River Foundry

**Facility Address:** 670 South Main Street  
Fall River, Wisconsin 53932

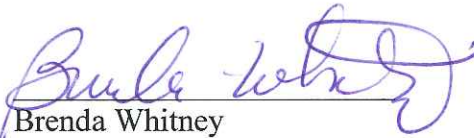
**EPA RCRA ID Number:** WID006426704

**Generator Status:** Conditionally Exempt Small Quantity Generator

**Facility Contact:** Dan Weinberger  
Corporate Administration

**U.S. EPA Inspector:** Brenda Whitney  
Environmental Engineer  
Compliance Section 2  
Resource Conservation and Recovery Act (RCRA) Branch

**Prepared By:**

  
Brenda Whitney  
Environmental Engineer

**Date Completed:**

10 - 1 - 2014  
Month / Day / Year

**Accepted By:**

  
Julie Morris  
Chief, Compliance Section 2  
RCRA Branch

**Date Accepted:**

10/5/14  
Month / Day / Year



## **Introduction**

I conducted an unannounced Compliance Evaluation Inspection (CEI) of the Fall River Foundry ("FRF" or "Facility") located at 670 South Main Street in Fall River, Wisconsin, on August 20, 2014. This CEI was an evaluation of FRF's compliance with the RCRA hazardous waste regulations codified in the Wisconsin Administrative Code and in the Code of Federal Regulations. FRF was operating as a conditionally exempt small quantity generator at the time of the inspection. Matthew Hilse of the Wisconsin Department of Natural Resources (WDNR) was unable to accompany me on this inspection. The following people were present for part or all of this inspection:

Brennen J. Weigel – President & CEI	FRF
Dan Weinberger – Corporate Administration	FRF
Brenda Whitney – Environmental Engineer	EPA

## **Introduction**

I displayed official credentials to Facility personnel upon arrival at FRF. The purpose and logistics of the CEI were delineated, and we discussed FRF's hazardous waste generation sources and treatment methods. I informed the facility representatives that I would be taking photographs during the CEI as needed. I provided three informational handouts to Mr. Melville: *SHWEC Environmental Programs (WDNR brochure)*; *P2 Technical Assistance Contacts*; and *U.S. EPA Small Business Resources*.

## **Site Description**

The following information about FRF is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

The facility is 130,000 ft<sup>2</sup> in size and houses 120 employees who work one 10-hour shift five days a week. Fall River Group is the corporate name under which three separate businesses operate in Wisconsin: Fall River Foundry (at this location), Rheocast Company (Germantown), and Fall River Manufacturing (Milwaukee).

According to the Fall River Group website at [www.fallrivergroup.com](http://www.fallrivergroup.com), FRF was incorporated in 1953 and began operations in 1954. Currently, FRF is mostly a non-ferrous, brass die caster and manufacturing company. They are considered a "high-production" foundry and have an in-house pattern shop. The castings range in size from less than one ounce up to 600 pounds. FRF runs both manual and automatic casting lines. The raw metals used at this facility include different alloys of brass, aluminum, and bronze. Many of these alloys are low-lead or lead free.

The process at this facility begins with purchasing ingots of certified alloys based on customer specifications. According to Mr. Weigel, approximately ten percent of the incoming metal contains lead. The ingots are melted in coreless induction furnaces which use a water-cooled coil solenoid around a crucible. The cooling system is closed loop. No process wastewater is generated at this facility. FRF runs ten furnaces at this site, each of which is vented to a baghouse for zinc oxide collection. This material is sold to a fertilizer manufacturer. The slag generated from the melters is collected and sold to a recycler.

FRF creates casting molds on eight lines using a combination of green silica, bentonite, water and pressure. The molds are patterned around the customer component to be cast. Cores are created for the internal geometry of the pattern and are made from a pre-mixed resin-coated sand that is blown into a core-box or "hot-box" to solidify the shape. The "hot-box" is vented to the ambient air outside. FRF also runs a "cold-box" system that uses a urethane binder process that requires the use of a sulfur dioxide catalyst. Any excess green silica sand or core sand is captured and reused. Dust collectors will pull the sand fines into one of two baghouses when the sand no longer meets appropriate grain size.

The castings are poured on either manual or automatic lines depending on a number of different factors including the size of the component and the number of castings in the run. The core of the pattern is chemically formulated to collapse when exposed to molten metal. Once cooled, the casting is broken out from the mold and taken to a cleaning room for shot blasting, deburring, grinding and/or finishing. The final casted piece is either released to the customer or sent for further finishing at Fall River Manufacturing, otherwise known as the Machine Shop, in Milwaukee. The broken off molds and cores (knock-out) that cannot be reused are collected in an overhead system and deposited in hoppers.

The hoppers of waste material are processed through a ball mill, which incorporates screens and a rare earth magnet to pull out metals that are collected for recycling. An auger system in the mill mixes in a metered amount of a lead-complexing agent called "Enviroblend," which is used to treat the lead content to below land disposal restriction requirements. Once the sand is processed through the mill, it collects mostly in supersacks, though a small percentage collects in a silo. Dust collection baghouses, which capture the sand fines associated with the molding lines, also used an auger system to meter in Enviroblend before dumping the treated fines into supersacks. All treated wastes are picked up by a waste hauler to be delivered to a Subtitle D nonhazardous landfill operated by Veolia. The zinc oxide dust pulled from the melters is not treated with the Enviroblend.

Used oil and universal waste are generated at the site from forklifts and hydraulic oil. Used oil is stored in 55-gallon drums and is taken by Crystal Clean. According to Mr. Weigel, no chlorinated solvents or other materials are used at the site. Universal waste is collected for recycling through Crystal Clean.

### **Site Tour**

The tour began at the back end of the process near hoppers that collect knock-out waste. The hoppers have no closure devices, but are continuously filling. According to Mr. Weigel, a hopper can fill in as little as a half hour. The hoppers were not labeled. I next observed the baghouses for



dust fines. Mr. Weigel pointed out the Enviroblend metering box that is directly above the supersacks of treated sand.

En route to the cleaning area, I observed a cylinder of used lamps near a loading dock. The container was neither closed nor labeled. I also observed hoppers filled with trim material, which are braces for smaller casts that are cut off and remelted.

Wheelabrators (tumbling shot blast equipment), cut-off saws, punch presses and grinders are among other finishing machines in the cleaning area. The blast material used in the Wheelabrators consists of iron and stainless steel. When it breaks down into dust, it is treated with the waste sand in the Wheelabrator before discharging the treated waste directly into supersacks. Some of this equipment is dedicated for no lead and the waste they generate does not require treatment.

A quality assurance lab in the facility is used for testing properties of the sand including grain size and binding factors, as well as for spectrometer analyses of the metal to ensure compliance with customer specifications. Wet chemistry is not conducted in this lab.

The ball mill is in a separate building on the property. The hoppers of waste sand are emptied in to the mill as soon as they are brought to the area. There did not appear to be any storage of the material prior to processing. Outside of the building, the metal recovered from the process was stored in three open-top yard bins.

As we walked back towards the foundry, I observed the zinc oxide baghouse system, which is attached to the outside of the main building. The system is enclosed in a non-earthen building that prevents wind dispersal of the material and contact with rain water. A supersack is used to collect the material. One sack was observed at that time. The sack was connected to the discharge tube and was, in effect, closed. Prior to re-entering the facility, I observed one 55-gallon drum that was labeled as "Used Oil." This drum was empty.

Back inside the building, the core room was next on the tour. Mr. Weigel explained that the sand is pre-coated with a water-based graphite to prevent brass penetration into the mold. The coating provides a smooth finish for the cast part.

Walking back to the offices, I observed the automated and manual casting lines as well as the mold packing areas. I also observed the conveyor system beneath the mold lines which carries the excess green sand back to the head of the process for reuse.

End of Tour.

### **Records and Emergency Preparedness Review**

In light of the fact that hazardous waste did not appear to be stored at the facility prior to treatment, I did not review training records, a contingency plan, weekly inspections, or any other applicable records required for large quantity generators who accumulate waste at their site in 90-day areas.

Manifests: Hazardous waste manifests are not used at this facility. All of the waste transported off-site has been either treated to meet LDRs or is non-hazardous. Non-Hazardous Waste Shipment Manifests are used in combination with Special Waste Profile sheets, which the landfill requires. A land disposal restriction form was not available for review for the treated waste.

Waste Determinations: Waste determinations have been made for the wastes generated at this facility. A TCLP analysis dated 7/31/14 of lead in the treated sand showed a level of less than 0.3 mg/l. Cadmium was not included in the data. No other analytical analyses were available for review.

Waste Analysis Plan: A WAP for the lead treatment process was not available for review at the time of the inspection.

Documentation for Hazardous Secondary Materials Used in Zinc Fertilizers: An MSDS for the zinc oxide fly ash had been generated by FRF. The hazardous ingredients section lists components of the material including zinc oxide, lead, and cadmium. The amount of each constituent is measured in percent. The maximum percentages of lead and cadmium in the material are 5.0 and 0.05, respectively.

A purchase order for the zinc oxide material indicates that it is sold to Fairbury NE Micros located at 56906 HWY 8 in Fairbury, Nebraska 68352.

It was not determined at the time of the inspection whether FRF had submitted a one-time notice to EPA as required to qualify for the zinc-bearing hazardous secondary materials exclusion. It was also not determined at the time of the inspection whether FRF had maintained three years of required shipping records.

### **Closing Conference**

The following items were discussed with FRF personnel at the close of the inspection:

- Generator status (currently notified as conditionally exempt)
- Waste analysis plan requirements for lead treatment
- Land disposal restriction form for the treated waste
- Satellite accumulation requirements
- Zinc secondary materials recycling requirements for generators
- Information collected during the inspection was deemed not to be Confidential Business Information.

### **Appendices**

Appendix A: Photograph Log

Appendix B: Checklists

Appendix C: Documents received during the inspection.

Appendix D: Post-Inspection emails and attachments.

### **Post-Inspection Note**

A TCLP analysis of the waste sand was conducted on 10/22/14. The sample passed all TCLP limits of concern. Specifically, the result for lead was 0.64mg/l, and the result for cadmium was <0.01mg/l. Based on this information, the waste sand is a non-hazardous waste. See Appendix D.



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# Appendix A

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## Photograph Log

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**Inspection Date:**

August 20, 2014

**Facility Name and ID Number:**

Fall River Foundry

EPA ID: WID006426704

**Inspector and Photographer:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

**Camera Used:**

Nikon Cool Pix P4 VR

Serial Number: 30530701

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Photograph 1 – Used lamps were collected in a container that was neither closed nor labled.



Photograph 2 – Waste sand collects in hoppers beneath a chute. The hopper is not labeled and does not have a cover.



Photograph 3 – Zinc oxide dust collects directly in a supersack. The sack is connected to the baghouse and is enclosed in a building.



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# Appendix B

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## Checklists

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**Inspection Date:**

August 20, 2014

**Facility Name and ID Number:**

Fall River Foundry

EPA ID: WID006426704

**Inspector:**

Brenda Whitney

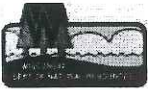
Compliance Section 2

RCRA Branch

Land and Chemicals Division

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Revision: 12/29/2009  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## VERY SMALL QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate less than 100 kg (220 lbs) of non acute hazardous waste in a calendar month or less than 1 kg (2.2 lbs) of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

### Section 1: Waste Information

A. A hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.220(6)(a) Photo <input type="checkbox"/>
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	Y	662.220(6)(a) Photo <input type="checkbox"/>
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1.).	Y	662.220(6)(a) Photo <input type="checkbox"/>
D. Waste is shipped to an approved or exempt facility.	Y	662.220(6)(e) Photo <input type="checkbox"/>

### Section 2: Manifest Requirements

A. Generator uses a manifest to ship hazardous waste. If NO, go to Section 3.	N	 Photo <input type="checkbox"/>
B. Generator submitted a notification form and obtained an EPA identification number.	Y	662.220(6)(f)1. Photo <input type="checkbox"/>
C. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1)).	N/A	662.220(6)(f)2. Photo <input type="checkbox"/>
D. A facility that is permitted or licensed to accept the waste is designated on the manifest (NR 662.020(2)).	N/A	662.220(6)(f)2. Photo <input type="checkbox"/>
E. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	N/A	662.220(6)(f)2. Photo <input type="checkbox"/>
F. If the manifest copy signed by the receiving facility is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department (NR 662.193(2)).	N/A	662.220(6)(f)3. Photo <input type="checkbox"/>
G. Generator retains a copy of the manifest signed by the generator until the signed copy from the designated facility is received (NR 662.040(1)).	N/A	662.220(6)(f)4. Photo <input type="checkbox"/>
H. A copy of each manifest is kept for at least three years from the date of shipment (NR 662.040(1)).	N/A	662.220(6)(f)4. Photo <input type="checkbox"/>

### Section 3: On-Site Storage in Containers

A. Generator accumulates waste in containers. If NO, go to Section 4.	No	 Photo <input type="checkbox"/>
B. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	N/A	662.220(6)(c)1. Photo <input type="checkbox"/>

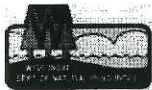
Key : C: Compliance CA: Compliance with Concern X: Non-Compliance NA: Not Applicable NI: Not Inspected

Y: Yes N: No UN: Unknown

Notes : 1. \* Dept. approved alternate may apply

2. Questions without a status entry use narrative responses





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WASTE & MATERIALS  
MANAGEMENT PROGRAM

## VERY SMALL QUANTITY GENERATOR INSPECTION

### Section 3: On-Site Storage in Containers

C. Containers are made or lined with materials compatible with the waste (NR 665.0172).	N/A	662.220(6)(c)1. Photo <input type="checkbox"/>
D. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.220(6)(c)1. Photo <input type="checkbox"/>
E. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.220(6)(c)1. Photo <input type="checkbox"/>
F. Containers are marked with the words, "Hazardous Waste".	N/A	662.220(6)(c)2. Photo <input type="checkbox"/>

### Section 4: Used Oil

A. Used oil is managed on-site. If NO, go to Section 5. <i>NONE OBSERVED</i>	Y	 Photo <input type="checkbox"/>
B. Used oil containers and tanks are in good condition and not leaking.	N/A	679.22(2) Photo <input type="checkbox"/>
C. Used oil containers and tanks are marked "used oil".	N/A	679.22(3)(a) Photo <input type="checkbox"/>
D. Transporter has an EPA ID number, except when the generator self-transport or has a tolling agreement.	Y	679.24 Photo <input type="checkbox"/>
E. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon of absorbent results from a non-routine spill.	N/A	 Photo <input type="checkbox"/>
F. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	N/A	679.23 Photo <input type="checkbox"/>
G. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	N/A	679.11 Photo <input type="checkbox"/>

### Section 5: Generator Status Evaluation

A. Less than the 220 lbs. (100 kg) of non-acute hazardous waste is generated in any month.	Y	662.220(6) Photo <input type="checkbox"/>
B. Less than 2,205 lbs. (1000 kg) of non-acute hazardous waste is accumulated.	Y	662.220(6)(b) Photo <input type="checkbox"/>
C. Describe other hazardous waste activities the generator is conducting at the facility.		 Photo <input type="checkbox"/>

Key: C: Compliance CA: Compliance with Concern X: Non-Compliance NA: Not Applicable NI: Not Inspected  
Y: Yes N: No UN: Unknown

Notes: 1. \* Dept. approved alternate may apply

2. Questions without a status entry use narrative responses



## VERY SMALL QUANTITY GENERATOR INSPECTION

Revision: 12/29/2009  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

### Section 5: Generator Status Evaluation

D. The Very Small Quantity Generator status is confirmed by this inspection.

Y

Photo ☐

Key : C: Compliance CA: Compliance with Concern X: Non-Compliance NA: Not Applicable NI: Not Inspected  
Y: Yes N: No UN: Unknown

Notes : 1. \* Dept. approved alternate may apply

2. Questions without a status entry use narrative responses







# UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

Revision: 03/27/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N/A	673.15(2)	Photo <input type="checkbox"/>
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	N	673.16	Photo <input type="checkbox"/>
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	N/A	673.17	Photo <input type="checkbox"/>

## Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.18(1)	Photo <input type="checkbox"/>
B. Handler that self-transportes complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	N/A	673.18(2)	Photo <input type="checkbox"/>
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.18(3)	Photo <input type="checkbox"/>
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.18(4)	Photo <input type="checkbox"/>
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	N/A	673.18	Photo <input type="checkbox"/>
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	N/A	673.18(7)	Photo <input type="checkbox"/>
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	N/A	673.18(8)	Photo <input type="checkbox"/>

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : \*: Dept. approved alternate may apply

No 'box' is an open ended question





Revision: 03/27/2012  
WASTE & MATERIALS  
MANAGEMENT PROGRAM

## UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANTITY HANDLER

Fall River Foundry

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

### Section 1: Prohibitions

A. Universal waste is not disposed on-site.	Y	673.11(1)	Photo <input type="checkbox"/>
B. Universal waste is not diluted or treated on-site.	Y	673.11(2)	Photo <input type="checkbox"/>

Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.

### Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	N/A	673.13	Photo <input type="checkbox"/>
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	N	673.13	Photo <input type="checkbox"/>
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	N/A	673.13(1)(b)	Photo <input type="checkbox"/>
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	N/A	673.13	Photo <input type="checkbox"/>
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	N/A	673.13(3)(b)	Photo <input type="checkbox"/>
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	N/A	673.13(2)	Photo <input type="checkbox"/>
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	N/A	673.13(2)	Photo <input type="checkbox"/>
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	N	673.14	Photo <input type="checkbox"/>
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	N/A	673.14	Photo <input type="checkbox"/>
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	N	673.15(3)	Photo <input type="checkbox"/>
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1)	Photo <input type="checkbox"/>



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# Appendix C

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## Documents received during the Inspection:

- Purchase Order for zinc oxide
- MSDS for zinc oxide
- Purchase settlement agreement for zinc oxide
- Analysis for Reclaim Sand (Report number: 1406353)
- Analysis for Reclaim Sand (Report number: 1407296)

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### **Inspection Date:**

August 20, 2014

### **Facility Name and ID Number:**

Fall River Foundry

EPA ID: WID006426704

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# PURCHASE ORDER

**INVOICE TO:**

Loveland Office  
2915 Rocky Mountain Ave.  
Suite 400  
Loveland CO 80538-9048

Order Number:	363244
Order Date:	April 03, 2014
Required Date:	April 03, 2014
Buyer:	Shirley Achtemeier
For:	41 -
Sales Order:	
Cust PO#:	

Phone: ( ) -

Fax: ( ) -

**Supplier:** FALL RIVER FOUNDRY CO.  
P.O. BOX 38  
FALL RIVER WI 53932-

**Deliver To:** Fairbury NE Micros  
56906 Hwy 8  
Fairbury NE 68352-

Phone: (920) 484-3311  
Fax: ( ) -

Phone:  
Fax:

Vendor Code	Vendor GST #	Terms	FOB	Ship Via
FALRIV		NET 30 DAYS		

Lin	Part Code	Wh	Order Quantity	Uom	Purchase Price	Uom	Line Value	Extended Value
1	54343 BRASS MILL FUME Weight: 34,000.00 LBS	41	34,000.00	LBS	0.1827	LBS	6,211.80	6,211.80
One load of zinc oxide delivered to Fairbury at \$.1827 per pound. SDS and C of A required with load. Contact 402-729-6191 ext. 1010 regarding delivery.								

Total Weight:	34,000.00	LBS	Line Totals	6,211.80
			Landed Cost	0.00
			Discount	0.00
			Freight	0.00
			Misc	
			Tax	0.00
			<b>Total Order (US)</b>	<b>\$6,211.80</b>

**Comments:**

By providing all or any part of the Goods and/or Services described in this Purchase Order ("PO"), Vendor is indicating its acceptance of this PO and agrees to be bound by all of its terms, without alteration or addition. If this PO is issued pursuant to a fully executed agreement between the parties, this PO is subject to the terms and conditions as stated in that agreement. If this PO is not issued pursuant to a fully executed agreement between the parties, this PO is subject to the terms and conditions as stated at [http://www.agrium.com/about\\_us/purchase\\_order\\_terms\\_and\\_conditions.jsp](http://www.agrium.com/about_us/purchase_order_terms_and_conditions.jsp). Please review pricing for each item as all payments to Vendor are based on this PO. To ensure prompt payment, please reference PO number above on all invoices, shipping papers, packages and correspondence. Should pricing, terms or quantities change, a new PO will have to be issued by Agrium Advanced Technologies. Contact Shirley Achtemeier at (402) 729-3074 if there are any discrepancies or changes.

**NOTE: Any changes to this order either in quantities or price must be approved prior to shipping.**



# MATERIAL SAFETY DATA SHEET

REV: 01/01/10

U.S. OSHA HAZARD COMMUNICATION STANDARD,  
29 CFR 1910.1200/ILL TSDA Pa 38-20

## SECTION 1

MANUFACTURER NAME

THE FALL RIVER FOUNDRY CO.

EMERGENCY TELEPHONE NO.

(920) 484-3311

ADDRESS (Number, Street, City, State, and Zip Code)

670 South Main St., Fall River, WI 53932

CHEMICAL NAME and SYNONYMS

Zinc Oxide

TRADE NAME and SYNONYMS

Zinc Oxide Fly Ash

CHEMICAL FAMILY

Metal

FORMULA

See Below

## SECTION II - HAZARDOUS INGREDIENTS

<u>ELEMENT</u>	<u>CAS NUMBER</u>	<u>PERCENTAGE</u>	<u>PEL</u> <u>OSHA 8-HR TWA MG/M3</u>	<u>TLV</u> <u>ACGIH 8-HR TWA MG/M3</u>
Zinc Oxide	1314-13-2	Balance	5 (Oxide Fume)	5 (Oxide Fume)
Lead	7439-92-1	5.00 Max	.05 (Fume)	0.05 (Fume)
Copper	7440-50-8	1.00 Max	0.1 (Fume)	0.1 (Fume)
Manganese	7439-96-5	.50 Max	5 (Fume)	1 (Fume)
Nickel	7440-02-0	.50 Max	1	1
Cadmium	7440-43-9	.05 Max	0.005	0.005

## SECTION III - PHYSICAL DATA

BOILING POINT (F°)

SPECIFIC GRAVITY (H<sub>2</sub>O=1)

5.67

Zinc	1663	
Lead	3137	
Copper	4703	Boiling Point:
Manganese	3806	Sublimes.
Nickel	4900	Melting Point:
Cadmium	1409	1975C (3587F)

APPEARANCE &amp; ODOR: Odorless white/grayish white powder

## SECTION IV - FIRE and EXPLOSION HAZARD DATA

FLASH POINT (Method used)

N/A

FLAMMABLE LIMITS

(%V)

LEL

N/A

ULI

N/A

EXTINGUISHING MEDIA

Dry chemicals or sand should be used with molten metals.

SPECIAL FIRE FIGHTING PROCEDURES

Fire Fighters should wear full protective clothing.

UNUSUAL FIRE AND EXPLOSION HAZARDS

DO NOT USE WATER ON MOLTEN METALS. Finely divided powder presents an explosion hazard.



## REPORT Fall River 2012-09

Vendor: **Fall River Foundry**

Document #

Vendor Code FALRIV

Invoice Date: 06/25/12

Due Date : 08/09/12

GRN#: 378703

Type: 21FMI

**Agrium Advanced Technologies**

56906 Hwy 8

FAIRBURY, NE 68352

**PURCHASE SETTLEMENT AGREEMENT**

PURCHASE ORDER 342657

SETTLEMENT DATE 7/5/2012

DATE REC'D 7/2/2012

BOL NO. 43690

GROSS WEIGHT 35,062

TARE WEIGHT 2,670

NET WEIGHT 32,392

DATE REC'D 7/2/2012

LME PRIOR MO. AVERAGE 87.5443

CONTRACT % 20

PREPARED BY SEA

INVOICE NUMBER 43690

MATERIAL	GROSS WEIGHT	DUNNAGE	MOISTURE CONTENT (%)	MOISTURE DEDUCTIONS	CLEAN DRY WEIGHT	METAL ASSAY %	METAL CONTENT LBS.	QUOTATION PER METAL CONTENT	TOTAL
ZINC OXIDE	32,392		1.25	405	31,987	69.71%	22,298	\$0.1751	\$3,904.13

NET DUE **\$3,904.13**







# BADGER LABORATORIES & ENGINEERING INC.

501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4868 • EST. 1966

(920) 729-1100 • FAX (920) 729-4945 • 1-800-776-7196

FALL RIVER FOUNDRY COMPANY  
670 SOUTH MAIN STREET  
FALL RIVER, WI 53932

REPORT NUMBER: 1406353  
REPORT DATE: 07/10/14  
SAMPLED BY: CLIENT  
EMAILED: 07/10/14

ATTN: MR. DAN WEINBERGER

1 SOLID

SAMPLE NUMBER: 44014925  
DESCRIPTION: RECLAIM SAND  
SAMPLE DATE: 06/24/14  
DATE RECEIVED: 06/25/14

TEST	RESULT/FLAGS	UNITS	LOD	LOQ	METHOD	ANALYZED	ANALYST
METALS DIGESTION	DONE		0.000	0.000	EPA200.2	07/07/14	CB
TCLP EXTRACTION	COMPLETE		0.000	0.000	SW846-13	07/02/14	JV
TCLP LEAD	<0.03	mg/l	0.030	0.100	SM3113B	07/09/14	CB

BADGER LABORATORIES & ENGINEERING  
WDNR Certified Lab #445023150

Approved:

JMW:smg

WI DNR Certified Lab #445023150  
WI Reg. Engineers (Corp.) #CE00601  
WI DATCP Certified #205 (Bacteria-Water)

Members  
WI Environmental Labs; Am. Chemical Soc.;  
T.A.P.P.I.; WI Food Processors Assn.;  
Wisc. Paper Council





**BADGER LABORATORIES & ENGINEERING INC.**  
501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4868 • EST. 1966  
(920) 729-1100 • FAX (920) 728-4845 • 1-800-776-7196

FALL RIVER FOUNDRY COMPANY  
670 SOUTH MAIN STREET  
FALL RIVER, WI 53932

REPORT NUMBER: 1407296  
REPORT DATE: 07/31/14  
SAMPLED BY: CLIENT  
EMAILED: 07/31/14

ATTN: MR. DAN WEINBERGER

1 SOLID

SAMPLE NUMBER: 44017220  
DESCRIPTION: RECLAIM SAND  
SAMPLE DATE: 07/22/14  
DATE RECEIVED: 07/23/14

TEST	RESULT/FLAGS	UNITS	LOD	LOQ	METHOD	ANALYZED	ANALYST
METALS DIGESTION	DONE		0.000	0.000	EPA200.2	07/28/14	CB
TCLP EXTRACTION	COMPLETE		0.000	0.000	SW846-13	07/23/14	JV
TCLP LEAD	<0.03	mg/l	0.030	0.100	SM3113B	07/30/14	CB

BADGER LABORATORIES & ENGINEERING  
WDNR Certified Lab #445023150

Approved:

JMW: smg

WI DNR Certified Lab #445023150  
WI Reg. Engineers (Corp.) #CE00601  
WI DATCP Certified #205 (Bacteria-Water)

Members  
WI Environmental Labs; Am. Chemical Soc.;  
T.A.P.R.I.; WI Food Processors Assn.;  
Wisc. Paper Council



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# Appendix D

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Email correspondence  
between Dan Weinberger of  
FRF and Brenda Whitney  
of EPA.

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Email dates:

1. EPA - September 22, 2014
  2. FRF – September 30, 2014
  3. EPA/FRF exchange – October 1  
and October 2
  4. FRF analytical results 10/22/14
-



**Whitney, Brenda**

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**From:** Whitney, Brenda  
**Sent:** Monday, September 22, 2014 2:56 PM  
**To:** 'dan'  
**Subject:** FW: EPA inspection at Fall River Foundry - 8/20/14

I'm sorry, Dan. I added one more question to the list. It is the new #9.

**From:** Whitney, Brenda  
**Sent:** Monday, September 22, 2014 2:08 PM  
**To:** 'dan'  
**Subject:** RE: EPA inspection at Fall River Foundry - 8/20/14

Hello,

Thank you for your patience. As promised, I have put together a list of questions to follow-up on our discussion during the inspection. Please e-mail or call me if you have any questions or if you require further clarification in order to answer my requests. **Please respond by October 1, 2014.**

Process-based questions:

1. Of the ten melters (furnaces) used at your facility, are any dedicated for lead materials?
2. Are all of the melters connected to the zinc oxide baghouse system?
3. Does the zinc oxide baghouse system have its own lead treatment process?
4. For the waste sand and molds that cannot be reused (to be processed in the ball mill), how is that material segregated from reusable material, captured, and conveyed to the hoppers? I simply remember seeing the hoppers beneath a silo of sorts. Is it collect via a vacuum system, conveyor belt, baghouse?
5. What size are the hoppers referred to in question 4?
6. How quickly do the hoppers in question 4 fill?
7. How is an employee alerted to the fact that the hopper is full?
8. Please approximate the weight of waste material that is generated in one month at your facility prior to treatment. Provide three separate estimations: 1) the zinc oxide dust; 2) the materials that are collected for treatment in the ball mill; and 3) the sand fines that collect directly in supersacks.
9. Please provide an explanation of how the lead treatment is conducted in a tanks, container, or containment building as defined by RCRA. Please include all of the lead treatment systems in your answer.

Document-based questions:

10. If available, please provide your Waste Analysis Plan that complies with the requirements of 40 CFR 268.7(a)(5).
11. If available, please provide a copy of your notification to the facility that receives your waste that complies with the requirements of 40 CFR 268.7(a)(3).
12. If available, please provide an analysis of your treated waste that includes TCLP levels for both lead and cadmium.
13. If available, please provide a copy of your one-time notice to EPA stating that Fall River Foundry is participating in the zinc-bearing hazardous secondary materials exclusion. See 40 CFR 261.4(a)(20)(ii)(A).
14. If available, please provide shipping documents for your zinc-bearing hazardous secondary material that include the information required under 40 CFR 261.4(a)(20)(ii)(D). Provide one record from each of the years 2012, 2013, and 2014.

Thank you very much for your attention to this matter.

Sincerely,

Brenda

---

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)

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**From:** dan [<mailto:dan@fallrivergroup.com>]  
**Sent:** Thursday, September 18, 2014 1:12 PM  
**To:** Whitney, Brenda  
**Subject:** RE: EPA inspection at Fall River Foundry - 8/20/14

OK

---

**From:** Whitney, Brenda [<mailto:whitney.brenda@epa.gov>]  
**Sent:** Thursday, September 18, 2014 10:43 AM  
**To:** [dan@fallrivergroup.com](mailto:dan@fallrivergroup.com)  
**Cc:** [brennen@fallrivergroup.com](mailto:brennen@fallrivergroup.com)  
**Subject:** EPA inspection at Fall River Foundry - 8/20/14

Hello Dan,

Thank you and Brennen for your time and cooperation during the inspection. I just wanted to drop you a note to let you know that I will be requesting some information from you in the next few days; hopefully, by Monday. I am sorry that it has taken me this long to communicate with you.

Thank you for your patience,

Brenda

---

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604  
312-353-4796 (ph)  
312-385-5505 (fax)



TO: EPA

ATTN: Brenda Whitney

Below are the answers to your questions of Monday, September 22, 2014.

- #1 Answer: NO
- #2 Answer: YES
- #3 Answer: NO
- #4 The material is coming off a series of screens in our molding sand system process and is released into a chute that has a hopper under it.
- #5 Answer: 1/3 yard
- #6 10 hours (1/3 yard per day)
- #7 Answer: Visual monitoring
- #8 Answer: 1) 3300# approx.  
2) 151 T  
3) 336 T
- #9 Sand treatment is done through our casting cleaning process (wheelabrators – 3 of them). Also, ball mill processing for recapture of tramp metal to re-clycle metal back into our melting process.
- #10 N/A see #9
- #11 Answer: attached via e-mail (#11)
- #12 Answer: attached via e-mail (#12)
- #13 Unavailable
- #14 Answer: attached via e-mail (#14)



# 11

**WASTE MANAGEMENT**

Special Waste Service Center  
W124 N9355 Boundary Road  
Menomonee Falls, WI 53051  
(414) 253-8620  
1-888-964-4700 Toll Free  
(414) 253-1322 Fax

February 17, 1999

Mr. Daniel Weinberg  
Fall River Foundry Company  
670 South Main Street  
Fall River, WI 53932

RE: Fall River Foundry - MW470638

Dear Mr. Weinberger:

Thank you for choosing Waste Management. This letter serves to confirm the approval of your waste.

Attached is a complete copy of the approval for your records. Please follow all conditions for disposal stated on the attached Special Waste Management Decision Section II B.

If you have any questions please do not hesitate to call me at 414/253-8620 / toll free  
888-964-4700

Sincerely,

Waste Management of Wisconsin, Inc.  
Special Waste Service Center

Peggy Slind  
Special Waste Coordinator

Enclosures



# NORTHERN REGION SPECIAL WASTE MANAGEMENT DECISION

MAD - MW 470638  
Waste Profile Sheet Code

I. Request For Decision: ☐ Initial ☒ Renewal

GENERATOR NAME: Fall River Foundry Co. ADDRESS: 670 South Main Street

CITY/STATE: Fall River, MA 03932

WASTE NAME(S): Foundry Sand

PROPOSED MANAGEMENT FACILITY: Madison Prairie Landfill

PROPOSED INTERMEDIATE

TRANSFER FACILITY: N/A

TRANSPORTER: Fall River Foundry Co.

WMNA REQUESTER: Terry Lind

SIGNATURE: Terry Lind

II. TECHNICAL MANAGER DECISION: (circle one)

APPROVED

DISAPPROVED

☐ Check if additional information is attached.

If Disapproved, Explain:

If Approved, Complete A,B,C  
And D Below:

A. Management Method(s):

LANDFILL (CODISPOSAL)

B. Precautions, Conditions, or  
Limitations on Approval

Per the Sites Special Waste Plan

Waste must not contain free liquids

C. Decision Expiration Date:

2/10/04

TECH MGR. SIGNATURE

Richard Peger

NAME (Print)

Richard L. Peger

DATE: 2/15/99

III. WMI MANAGEMENT FACILITY SITE MANAGER DECISION (circle one)

APPROVED

DISAPPROVED

If Approved, State Any  
Additional Precautions,  
Conditions, or Limitations

SITE MGR. SIGNATURE

Louis E. Behlenden

NAME (Print)

Louis E. Behlenden

DATE: 2-15-99

IV. WMI INTERMEDIATE TRANSFER FACILITY SITE MANAGER DECISION (circle one)

APPROVED

DISAPPROVED

If Approved, State Any  
Additional Precautions,  
Conditions, or Limitations

SITE MGR. SIGNATURE

NAME (Print)

DATE:

P.03

FAX NO.

ORCHARD RIDGE

FEB-15-99 MON 10:15 AM



# MIDWEST REGION GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Waste Profile Sheet Code

MW 470638

Proposed Management Facility

This form is to be used to comply with the requirements of a waste agreement.

INSTRUCTIONS FOR COMPLETING THIS FORM ARE ATTACHED

Decision Expiration Date: 1/1

## A. WASTE GENERATOR INFORMATION

1. Generator Name: FALL RIVER FOUNDRY CO. 2. SIC Code: 3366  
3. Facility Address (site of waste generation): 670 S. MAIN ST.  
4. Generator City, State: FALL RIVER, ILL. 5. Zip/Postal Code: 53932  
6. State ID#: 111-002-769  
7. Technical Contact: DANIEL WEINBERGER 8. Phone: (920) 484-3311

## B. WASTE STREAM INFORMATION (See instructions)

1. Name of Waste: USED FOUNDRY SAND  
2. Process Generating Waste: MOLDING SYSTEMS  
3. Amount/Units: APPROX. 15 TON DAILY 4. Type A ☒ Type B ☐  
5. Special Handling Instructions/Supplemental Information:

6. Incidental Waste Types and Amounts: OCCASIONAL CEMENT BLOCK

## C. TRANSPORTATION INFORMATION

1. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Sludge ☒ Bulk Solid ☐ Drum/Box ☐ Other  
2. Supplemental Shipping Information: TRUCKING TO BE DONE BY GENERATOR

## D. PHYSICAL CHARACTERISTICS OF WASTE (See instructions) (Omit for Type B)

1. Color: TAN/ GREY	2. Does the waste have a strong incidental odor? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes: If so, describe:	3. Physical State @ 70°F/21°C: <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Semi-Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Powder <input type="checkbox"/> Other:	4. Layers: <input type="checkbox"/> Multi-layered <input type="checkbox"/> Bi-layered <input checked="" type="checkbox"/> Single Phased	5. Specific Gravity: Range 2.4 - 2.4	6. Free Liquids: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Volume: %
7. pH: <input type="checkbox"/> ≤ 2 <input type="checkbox"/> > 2-4 <input type="checkbox"/> 4-7 <input type="checkbox"/> 7 <input type="checkbox"/> 7-10 <input type="checkbox"/> 10- < 12.5 <input type="checkbox"/> ≥ 12.5 <input type="checkbox"/> Range <input checked="" type="checkbox"/> NA	8. Flash Point: <input checked="" type="checkbox"/> None <input type="checkbox"/> < 140°F/60°C <input type="checkbox"/> 140 - 199°F/60 - 93°C <input type="checkbox"/> ≥ 200°F/93°C <input type="checkbox"/> Closed Cup <input type="checkbox"/> Open Cup				

## E. CHEMICAL COMPOSITION (Omit for Type B) RANGE (MIN-MAX)

1. ARSENIC	TCLP	<	- 0.001%
BARIUM	TCLP	-	.43 %
CHROMIUM	TCLP	<	.01 %
CHROMIUM	TCLP	-	.07 %
LEAD	TCLP	2	- .3 %
MERCURY	TCLP	<	.0002 %
SELENIUM	TCLP	<	.010 %
SILVER	TCLP	-	.01 %
BALANCE	(SAND)	-	96.46 %
Total:		-	100 %

2. Does the waste contain any of the following?  
(provide concentration if known):

	NO OR	LESS THAN	OR ACTUAL
PCB's	<input checked="" type="checkbox"/>	<input type="checkbox"/> < 50 ppm	ppm
Cyanides	<input checked="" type="checkbox"/>	<input type="checkbox"/> < 50 ppm	ppm
Sulfides	<input checked="" type="checkbox"/>	<input type="checkbox"/> < 50 ppm	ppm
Phenols	<input checked="" type="checkbox"/>	<input type="checkbox"/> < 50 ppm	ppm

The total composition must be greater than or equal to 100%. (.0001% = 1 ppm or 1 mg/l)

OCF-225-07

2 of 1 pages

P.06

FAX NO. 4142531322

WASTE MGT - SERVICE CTR

FEB-9-99 TUE 15:42

No. 1621 P. 4

Sep. 30. 2014 2:28PM

F. SAMPLING SOURCE (Omit for Type B) (e.g., Drum, Lagoon, Pit, Pond, Tank, Vat)

G. REPRESENTATIVE SAMPLE CERTIFICATION (Omit for Type B)

1. Print Sampler's Name: \_\_\_\_\_ 2. Sample Date: \_\_\_\_\_

3. Sampler's Title: \_\_\_\_\_

4. Sampler's Employer (If other than Generator): \_\_\_\_\_

The sampler's signature certifies that any sample submitted is representative of the waste described above pursuant to 40 CFR 261.20(c) or equivalent rules.

5. Sampler's Signature \_\_\_\_\_

H. GENERATOR CERTIFICATION

By signing this profile sheet, the Generator certifies:

1. This waste is not "Hazardous Waste" as defined by USEPA and/or state regulation.
2. This waste does not contain regulated radioactive materials or regulated concentrations of PCB's (Polychlorinated Biphenyls).
3. The waste does not contain regulated concentrations of the following pesticides and herbicides: Chlordane, Endrin, Heptachlor (and it's epoxide), Lindane, Methoxychlor, Toxaphene, 2, 4-D, or 2, 4, 5-TP (Silvex).
4. The waste does not contain halogenated compounds such as: tetrachloroethylene, trichloroethylene, methylene chloride, 1, 1, 1-trichloroethane, carbon tetrachloride, chloroform, ortho-dichlorobenzene, dichlorodifluoromethane, 1, 1, 2-trichloro-1, 2, 2-difluoroethane, trichlorofluoromethane, 1, 1-dichloroethylene, and 1, 2-dichloroethylene at greater than 1% (10,000 ppm) total solvent concentration. This listing includes any combination of the above named halogenated compounds where the total concentration or the sum of the concentrations of the individual compounds exceed 1% or 10,000 ppm on a weight to weight basis.
5. This sheet and the attachments contain true and accurate descriptions of the waste material. All relevant information regarding known or suspected hazards in the possession of the Generator has been disclosed.
6. The Generator has read and understands the Contractor's Definition of Special Waste included in Part B.5. of the attached Instructions form. All types and amounts of special wastes provided in incidental amounts have been identified in section B.6. of this form.
7. The analytical data presented herein or attached hereto were derived from testing a representative sample taken in accordance with 40 CFR 261.20(c) or equivalent rules.
8. If any changes occur in the character of the waste, the Generator shall notify the Contractor prior to providing the waste to the Contractor.

9. Signature \_\_\_\_\_ 10. Title Vice President of Manufacturing

11. Name (Type or Print) Brennon Weigel 12. Date February 10, 1999

Note: Omit sections D, E, F, and G, for Type B waste.

Comments:



# SPECIAL WASTE PLAN

## ANALYTICAL TESTING VARIANCE

Generator MW 470638  
Profile Number Fall River Foundry Co

### Reason for variance from Plan

Waste is adequately characterized by this testing

R. Hager  
Signature

2/15/99  
Date

testvar

CHEMISTS  
ENGINEERSBADGER LABORATORIES & ENGINEERING CO.  
INC.501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4668 • EST. 1966  
(920) 728-1100 • FAX (920) 728-4845 • 1-800-776-7196FALL RIVER FOUNDRY COMPANY  
670 SOUTH MAIN STREET  
FALL RIVER, WI 53932REPORT NUMBER: 99000322  
REPORT DATE: 01/04/99 \*  
SAMPLED BY: CLIENT

ATTN: MR. DAN WEINBERGER

A

2 SANDS

SAMPLE NUMBER: 29000666  
DESCRIPTION: FR1215HH  
SAMPLE DATE: 12/15/98  
DATE RECEIVED: 12/16/98


Bag House

TEST	RESULT/FLAG	UNITS	LOD	LOQ	METHOD	ANALYZED	ANALYST
METALS DIGESTION	DONE		0.000	0.000	3010A	12/22/98	LP
TCLP EXTRACTION	DONE		0.000	0.000	1311	12/21/98	LP
TCLP LEAD	<0.06	mg/l	0.060	0.170	239.1	12/30/98	CB

SAMPLE NUMBER: 29000667  
DESCRIPTION: FR1215RE  
SAMPLE DATE: 12/15/98  
DATE RECEIVED: 12/16/98

Reclaim Sand

TEST	RESULT/FLAG	UNITS	LOD	LOQ	METHOD	ANALYZED	ANALYST
METALS DIGESTION	DONE		0.000	0.000	3010A	12/22/98	LP
TCLP EXTRACTION	DONE		0.000	0.000	1311	12/21/98	LP
TCLP LEAD	2.0	mg/l	0.060	0.170	239.1	12/30/98	CB

BADGER LABORATORIES & ENGINEERING  
WDNR Certified Lab #445023150
  
Stephen C. Taylor  
Chief Chemist

SCT:mw

WI DNR Certified Lab #445023150  
WI Reg. Engineers (Corp.) #CE00601  
WI Div. Health Cert. Lab #205, Bacteria waterMembers  
WI Environmental Labs; Am. Chemical Soc.;  
Water Pollution Control Fed.; T.A.P.R.L.;  
WI Food Processors Assn.; Wisc. Paper Council

CHEMISTS

ENGINEERS

## BADGER LABORATORIES &amp; ENGINEERING CO. INC.

501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4868 • EST. 1966  
(820) 728-1100 • FAX (820) 728-4845 • 1-800-776-7196FALL RIVER FOUNDRY COMPANY  
670 SOUTH MAIN STREET  
FALL RIVER, WI 53932REPORT NUMBER: 98004898  
REPORT DATE: 09/04/98  
SAMPLED BY: CLIENT

ATTN: MR. DAN WEINBERGER

"B"

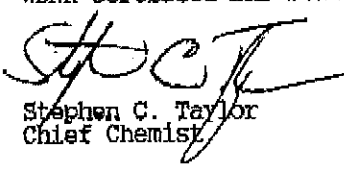
2 SANDS

SAMPLE NUMBER: 28010839  
DESCRIPTION: FR817BK  
SAMPLE DATE: 08/17/98  
DATE RECEIVED: 08/18/98

TEST	RESULT/FLAG	UNITS	LOD	LOQ	METHOD	ANALYZED	ANAL
METALS DIGESTION	DONE		0.000	0.000	3015	08/25/98	LP
TCLP ARSENIC	<0.010/N	mg/l	0.002	0.045	206.2	09/03/98	CB
TCLP BARIUM	0.24	mg/l	0.200	0.600	208.1	09/04/98	CB
TCLP CADMIUM	<0.01	mg/l	0.010	0.020	213.1	08/26/98	CB
TCLP CHROMIUM	<0.04	mg/l	0.040	0.120	218.1	08/26/98	CB
TCLP EXTRACTION	DONE		0.000	0.000	1311	08/24/98	LP
TCLP LEAD	<0.07	mg/l	0.060	0.170	239.1	09/02/98	CB
TCLP MERCURY	<0.0002	mg/l	0.0002	0.0006	245.1	08/31/98	LP
TCLP SELENIUM	<0.010/N	mg/l	0.002	0.002	270.2	09/03/98	CB
TCLP SILVER	0.01	mg/l	0.010	0.030	272.1	08/26/98	CB

SAMPLE NUMBER: 28010840  
DESCRIPTION: FR817RE  
SAMPLE DATE: 08/17/98  
DATE RECEIVED: 08/18/98

TEST	RESULT/FLAG	UNITS	LOD	LOQ	METHOD	ANALYZED	ANAL
METALS DIGESTION	DONE		0.000	0.000	3015	08/25/98	LP
TCLP ARSENIC	<0.010/N	mg/l	0.002	0.045	206.2	09/03/98	CB
TCLP BARIUM	0.43	mg/l	0.200	0.600	208.1	09/04/98	CB
TCLP CADMIUM	<0.01	mg/l	0.010	0.020	213.1	08/26/98	CB
TCLP CHROMIUM	0.07	mg/l	0.040	0.120	218.1	08/26/98	CB
TCLP EXTRACTION	DONE		0.000	0.000	1311	08/24/98	LP
TCLP LEAD	0.83	mg/l	0.060	0.170	239.1	09/02/98	CB
TCLP MERCURY	<0.0002	mg/l	0.0002	0.0006	245.1	08/31/98	LP
TCLP SELENIUM	<0.010/N	mg/l	0.002	0.002	270.2	09/03/98	CB
TCLP SILVER	0.01	mg/l	0.010	0.030	272.1	08/26/98	CB

BADGER LABORATORIES & ENGINEERING  
WDNR Certified Lab #445023150
  
 Stephen C. Taylor  
 Chief Chemist

SCT:mw

WI DNR Certified Lab #445023150  
WI Reg. Engineers (Corp.) #CE00801  
WI Div. Health Cert. Lab #205, Bacteria waterMembers  
WI Environmental Lab; Am. Chemical Soc.;  
Water Pollution Control Fed.; T.A.P.P.I.;  
WI Food Processors Assn.; Wisc. Paper Council

TOTAL P.03





Waste Management of Wisconsin, Inc.  
 7124 N9365 Boundary Road  
 Menomonee Falls, WI 53051  
 (414) 858-8620 Fax: (414) 858-1822  
 Toll Free: 1-888-964-4700

# SERVICE AGREEMENT NON-HAZARDOUS WASTE DISPOSAL

The above-named disposal facility and corporation are referred to herein as "Facility" and "Contractor," respectively.

CUSTOMER'S BILLING NAME <u>FALL RIVER FOUNDRY CO.</u>	
CUSTOMER'S BILLING ADDRESS <u>670 S. MAIN ST.</u>	
CITY, STATE/ZIP CODE <u>FALL RIVER, WI 53932</u>	
CUSTOMER CONTACT <u>DANIEL WEINBERGER</u>	
PHONE NUMBER <u>(720) 484-3311</u>	
BANK REFERENCE <u>BANK ONE</u>	BANK CONTACT <u>RICHARD GRAY</u>
	PHONE NUMBER <u>414 765-3290</u>

Credit may be extended to Customer after appropriate credit information is a form acceptable to Contractor, has been presented to and reviewed by Contractor. Contractor may, in its sole discretion, require a collateral deposit (in the form of cash, letter of credit or money bond) acceptable to Contractor. It is the responsibility of the Customer to keep said collateral deposit current. Collateral deposits, where required, may be adjusted when there is an increase in disposal tonnage and/or cost. Collateral deficiencies must be corrected within 30 days of notice of required adjustment.

~~THIS SERVICE AGREEMENT IS SUBJECT TO THE TERMS AND CONDITIONS OF THE SPECIAL WASTE MANAGEMENT DECISION (PROFILE NO. MW470638) ATTACHED HERETO.~~

## ESTIMATED MONTHLY AMOUNT OF WASTE FOR DISPOSAL:

400 TONS  
 (includes such as, iron, steel, pounds, kilograms)

## SPECIAL INSTRUCTIONS:

See Section I on the attached Special Waste Management Decision (Profile No. MW470638) Feb 15/99  
 for the approved management facility. Follow all conditions for disposal stated on the Special Waste  
 Management Decision Section II B. All loads must be manifested.

## INCIDENTAL SPECIAL WASTE TYPES AND AMOUNTS:

OCCASIONAL CEMENT BLOCK

THE TERMS AND CONDITIONS OF SERVICE ARE THE AGREEMENT BETWEEN CUSTOMER AND CONTRACTOR OF SPECIAL WASTE DISPOSAL.

CUSTOMER  
[Signature]  
 Vice President of Manufacturing

CONTRACTOR  
 Waste Management of Wisconsin, Inc.  
[Signature] Site Manager

WM0008E (07/95)

P.08

FAX NO. 4142631322

WASTE NOT - SERVICE QTR

FEB-9-99 TUE 15:44

P.02

FAX NO.

ORCHARD RIDGE

FEB-15-99 MON 10:14 AM

## TERMS AND CONDITIONS OF DISPOSAL SERVICE AGREEMENT

**The Agreement.** The entire agreement of the parties for the disposal of waste (the "Agreement") shall consist of this Service Agreement and any applicable Generator's Waste Profile Sheet(s).

**Waste Accepted at Facility.** Customer warrants that the waste delivered to Contractor hereunder will not contain a regulated quantity of any hazardous, radioactive, or toxic waste or substance as defined by applicable Federal, state, local or provincial laws or regulations.

**Special Waste.** Customer acknowledges reading the attached Contractor's Definition of Special Waste (dated 02/92), and warrants that the waste delivered to Contractor hereunder will not contain any Special Waste unless and except: (1) as specifically described on Generator's Waste Profile Sheet(s) attached hereto or which Contractor later agrees to accept in writing; or (2) incidental amounts of Special Waste, as listed by Customer in the "Incidental Special Waste Types and Amounts" section of this form. The parties may incorporate additional Special Waste as part of this Agreement if prior to delivery of such waste to Contractor, Customer has provided a Generator's Waste Profile Sheet for such waste and Contractor has approved disposal of such waste in writing. Customer agrees to comply with precautions, limitations, and conditions contained in Contractor's written notice of approval of Special Waste.

**Rights of Refusal/Rejection.** Contractor has the right to refuse or reject after acceptance any load of wastes delivered to the Facility if the Contractor believes the Customer has breached (or is breaching) its warranties or agreements hereunder. If Customer delivers wastes in breach of any warranty or agreements herein, Contractor may in its sole discretion either remove and dispose of that waste and charge Customer for the costs or require Customer to promptly remove the waste.

**Limited License to Enter.** During the term of this Agreement, Customer shall have a license to enter the Facility for the limited purpose of, and only to the extent necessary for, off-loading waste at the location and in the manner directed by Contractor. Except in an emergency, or at the express direction of Contractor, Customer's personnel shall not leave the immediate vicinity of their vehicle. After off-loading the waste, Customer's personnel shall promptly leave the Facility. Under no circumstances shall Customer or its personnel engage in any scavenging of waste at the Facility. Contractor may refuse to accept waste from, and shall deny an entrance license to, any of Customer's personnel whom Contractor believes is under the influence of alcohol or other chemical substances.

**Charges and Payment.** Unless otherwise agreed in writing by the parties hereto, Customer agrees to pay Contractor's posted disposal rates which may change from time to time. Customer shall be liable for all taxes, fees, or other charges imposed upon the disposal of Customer's waste by Federal, state, local or provincial laws and regulations. Payment shall be made by Customer within ten (10) days after the date of the invoice from Contractor. In the event that any payment is not made when due, Contractor may terminate the Agreement. Customer agrees to pay a late fee for all past due payments not to exceed the maximum rate allowed by applicable law.

**Term.** This Agreement shall continue in effect until terminated by either party, with or without cause, upon forty-eight (48) hours notice. Customer's representations and warranties regarding the waste delivered and the mutual indemnities set forth herein shall survive termination of this Agreement.

**Driver's Knowledge and Authority.** Customer warrants that its drivers who deliver waste to the Facility have been advised by Customer of Contractor's prohibition of deliveries of hazardous, radioactive, or toxic waste to the Facility, of Contractor's restrictions on deliveries of Special Waste to the Facility, of the definitions of "hazardous waste" and "Special Waste" herein provided, and of the terms of this license to enter the Facility.

**Indemnification.** (A) Contractor agrees to indemnify, save harmless, and defend the Customer from and against any and all liabilities, claims, penalties, forfeitures, suits, and the costs and expenses incident thereto (including costs of defense, settlement, and reasonable attorneys' fees), which it may hereafter incur, become responsible for, or pay out as a result of death or bodily injuries to any person, destruction or damage to any property, contamination of or adverse effects on the environment, or any violation of governmental laws, regulation, or orders caused solely by the negligent act, negligent omission or willful misconduct of Contractor's employees, or its subcontractors in the performance of the Agreement.

(B) Customer agrees to indemnify, save harmless, and defend Contractor from and against any and all liabilities, claims, penalties, forfeitures, suits, and the costs and expenses incident thereto (including costs of defense, settlement, and reasonable attorneys' fees), which it may hereafter incur, become responsible for, or pay out as a result of death or bodily injuries to any person, destruction or damage to any property, contamination of or adverse effects on the environment, or any violation of governmental laws, regulations, or orders caused, in whole or in part by the Customer's breach of any warranty, term or provision of the Agreement, or any negligent act, negligent omission or willful misconduct of the Customer, its employees, or subcontractors in the performance of the Agreement.

**Attorney's Fees.** In the event of a breach of the Agreement, the breaching party shall pay all reasonable attorneys' fees, collection fees and costs of the other party incident to any action brought to enforce the Agreement.

**Assignment.** Neither party may assign, transfer to otherwise vest in any other company, entity or person, any of its rights or obligations under the Agreement without the prior written consent of the other party, which consents shall not be unreasonably withheld; provided, however, that Contractor may, without any such prior written consent, assign its rights and/or obligations under the Agreement to a subsidiary or affiliate corporation.

**Miscellaneous.** The Agreement shall be binding upon and shall inure to the benefit of the parties hereto and their respective successors and permitted assigns. The Agreement shall be governed by and construed in accordance with the laws of the State in which the Facility is located.

(07/96)



Advanced Disposal

6/20

SPECIAL WASTE PROFILE SHEET

Profile # GRL

Designated Facility: Glacier Ridge Landfill

Sales Representative: \_\_\_\_\_

Recertification ☐  
One Time Project ☐  
Ongoing Project ☐

A. Generator

Name FALL RIVER FOUNDRY  
Site Address 670 SOUTH MAIN  
City, State, Zip FALL RIVER, WI. 53932  
Contact DANIEL WEINBERGER  
Phone 920 484 3311 XT 179  
Fax 920 484 3410

B. Billing

Name SAME  
Address \_\_\_\_\_  
City, State \_\_\_\_\_ Zip \_\_\_\_\_  
Contact \_\_\_\_\_  
Phone \_\_\_\_\_  
Fax \_\_\_\_\_

C. Description of Waste

Name of Waste WHEELABRATOR DUST  
Process Generating Waste CASTING CLEANING PROCESS

Estimated Volume 2 T Frequency DAILY  
Physical State POWDER/DUST Color GREY  
Free Liquids N/A PH \_\_\_\_\_  
Flash Point (°F) N/A Total Solid \_\_\_\_\_

D. Other Waste Data or Comments

E. Sample/Analysis Information

Check all that apply:

☐ Sample submitted with profile ☒ Laboratory Analysis submitted ☐ Material Safety Data Sheet Submitted

Laboratory Name BADGER LABS Sample Date 9-12-13 Sample I.D. #91213 VEC1A

F. Generator Certification

This waste is not a hazardous waste as defined Wisconsin Administrative Code NR661 or 40 CFR 261.

This waste does not contain regulated quantities of PCBs.

This waste does not contain regulated quantities of herbicides or pesticides.

This waste does not contain infectious wastes as defined in Wisconsin Administrative Code NR 526.

To the best of my knowledge, all information submitted in this and all attached documents contain true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix 1 and was obtained by using this or an equivalent sampling method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

Generator's Signature Daniel R. Weinberger

Title CORPORATE ADMIN.

Print Name DANIEL R. WEINBERGER

Date 9-18-13

G. Landfill Approval

My approval is based upon the laboratory analysis of a representative sample and/or material safety data sheets submitted by the generator.

Landfill Signature \_\_\_\_\_

Date \_\_\_\_\_

Approvals Signature \_\_\_\_\_

Date \_\_\_\_\_

Waste Category \_\_\_\_\_ Analytical Protocol \_\_\_\_\_ Disposal Operation \_\_\_\_\_ Recert. Date \_\_\_\_\_

FALL RIVER FOUNDRY COMPANY  
670 SOUTH MAIN STREET  
FALL RIVER, WI 53932

REPORT NUMBER: 1308700  
REPORT DATE: 10/03/13  
SAMPLED BY: CLIENT

ATTN: MR. DAN WEINBERGER

1 SOLID

SAMPLE NUMBER: 43020149  
DESCRIPTION: DUST #91213 VEOLIA  
SAMPLE DATE: 09/12/13  
DATE RECEIVED: 09/13/13

TEST	RESULT/FLAGS	UNITS	LOD	LOQ	METHOD	ANALYZED	ANALYST
METALS DIGESTION	DONE		0.000	0.000	3020A	09/23/13	CB
TCLP ARSENIC	0.016	mg/l	0.005	0.016	SM3113B	09/26/13	CB
TCLP BARIUM	<0.11	mg/l	0.110	0.370	SM3111D	09/25/13	CB
TCLP CADMIUM	<0.01	mg/l	0.010	0.020	SM3111B	09/25/13	CB
TCLP CHROMIUM	0.06	mg/l	0.030	0.100	SM3111B	09/25/13	CB
TCLP EXTRACTION	DONE		0.000	0.000	1311	09/19/13	JW
TCLP LEAD	0.37	mg/l	0.020	0.080	SM3113B	09/25/13	CB
TCLP MERCURY		mg/l	0.000	0.000	SM3112B	/ /	
TCLP SELENIUM	<0.007	mg/l	0.001	0.002	SM3113B	10/02/13	CB
TCLP SILVER	<0.01	mg/l	0.010	0.020	SM3113B	09/24/13	CB

BADGER LABORATORIES & ENGINEERING  
WDNR Certified Lab #445023150

**BADGER LABORATORIES & ENGINEERING INC.**

501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4868 • EST. 1968  
(920) 728-1100 • FAX (920) 728-4848 • 1-800-778-7188

FALL RIVER FOUNDRY COMPANY  
670 SOUTH MAIN STREET  
FALL RIVER, WI 53932

REPORT NUMBER: 1308700  
REPORT DATE: 10/07/13  
SAMPLED BY: CLIENT  
EMAILED: 10/07/13

ATTN: MR. DAN WEINBERGER

1 SOLID

SAMPLE NUMBER: 43020149  
DESCRIPTION: DUST #91213 VEOLIA  
SAMPLE DATE: 09/12/13  
DATE RECEIVED: 09/13/13

TEST	RESULT/FLAGS	UNITS	LOD	LOQ	METHOD	ANALYZED	ANALYST
METALS DIGESTION	DONE		0.000	0.000	3020A	09/23/13	CB
TCLP ARSENIC	0.016	mg/l	0.005	0.016	SM3113B	09/26/13	CB
TCLP BARIUM	<0.11	mg/l	0.110	0.370	SM3111D	09/25/13	CB
TCLP CADMIUM	<0.01	mg/l	0.010	0.020	SM3111B	09/25/13	CB
TCLP CHROMIUM	0.06	mg/l	0.030	0.100	SM3111B	09/25/13	CB
TCLP EXTRACTION	DONE		0.000	0.000	1311	09/19/13	JW
TCLP LEAD	0.37	mg/l	0.020	0.080	SM3113B	09/25/13	CB
TCLP MERCURY	<0.0002	mg/l	0.0002	0.0008	SM3112B	10/03/13	CB
TCLP SELENIUM	<0.007	mg/l	0.001	0.002	SM3113B	10/02/13	CB
TCLP SILVER	<0.01	mg/l	0.010	0.020	SM3113B	09/24/13	CB

BADGER LABORATORIES & ENGINEERING  
WDNR Certified Lab #445023150

Approved:

JMW:bam

WI DNR Certified Lab #445023150  
WI Reg. Engineers (Corp.) #CE00601  
WI DATCP Certified #205 (Bacteria-Water)

Members  
WI Environmental Labs; Am. Chemical Soc.;  
T.A.P.P.I.; WI Food Processors Assn.;  
Wiso. Paper Council

## SAMPLE RECEIPT FORM

Telephone (920) 484-3311  
Fax (920) 484-3410

ADDITIONAL REPORTS TO:

☒ Normal  
☐ Rush (Approval \_\_\_\_\_)

☐ Groundwater ☐ Lab Filtered

☐ Wastewater ☐ Field Filtered

☐ WPOES ☐ Grab

☐ Cooling Water ☐ Composite

☐ Drinking Water ☐ Flow Proportional

☐ Solid Waste ☐ Time Proportional

☐ Oil

☒ Other

[illegible]

LOGGED IN

- sampprd2.xls  
11-26-08



# BADGER LABORATORIES & ENGINEERING INC.

501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4868 • EST. 1968  
(920) 728-1100 • FAX (920) 728-4845 • 1-800-776-7198

## MAXIMUM CONCENTRATION OF CONTAMINANTS FOR TOXICITY CHARACTERISTIC

Contaminant	Regulatory Level (mg/l.)
-------------	-----------------------------

Arsenic	5.0
Barium	100.0
Benzene	0.5
Cadmium	1.0
Carbon tetrachloride	0.5
Chlordane	0.03
Chlorobenzene	100.0
Chloroform	6.0
Chromium	5.0
o-Cresol	200.0
m-Cresol	200.0
p-Cresol	200.0
Cresol	10.0
2,4-D	7.5
1,4-Dichlorobenzene	0.5
1,2-Dichloroethane	0.7
1,1-Dichloroethylene	0.13
2,4-dinitrotoluene	0.02
Endrin	0.008
Heptachlor (and its hydroxide)	0.13
Hexachlorobenzene	0.5
Hexachloro-1,3-butadiene	3.0
Hexachloroethane	5.0
Lead	0.4
Lindane	0.2
Mercury	10.0
Methoxychlor	200.0
Methyl ethyl ketone	2.0
Nitrobenzene	100.0
Pentachloroophenol	5.0
Pyridine	1.0
Selenium	5.0
Silver	0.7
Tetrachloroethylene	0.5
Toxaphene	0.5
Trichloroethylene	400.0
2,4,5-Trichlorophenol	2.0
2,4,6-Trichlorophenol	1.0
2,4,5-TP (Silvex)	0.2
Vinyl chloride	

WI DNR Certified Lab #445023150  
WI Reg. Engineers (Corp.) #CE00801  
US EPA Certified #205 (Microbia-Water)

Members  
WI Environmental Labs; Am. Chemical Soc.;  
T.A.P.R.I.; WI Food Processors Assn.;  
Wisc. Paper Council

#12

### WASTE ANALYSIS REPORT

This report is intended for the sole use and benefit of Veolia Environmental Services and its companies.  
No representation concerning significance of the reported data is made to any other person or entity.

#### SAMPLE INFORMATION

Sample ID Number and Generator: 8310-00-06 Fall River Foundry

Waste Profile Number: NA

Sampler: FL

Sample Size: QT

Sampling Date: \_\_\_\_\_

Sample Receipt Date: 1/2/2007

PARAMETER	CODE	METHOD #	LOQ	RESULT	INITIALS	DATE
Physical Appearance	PA	ASTM D4979-89				
Layers: <u>1</u>	% Liquids: <u>0</u>			Incidental Oil		
Color: (layer 1) _____	(layer 2) _____					
Lvr 1: <input checked="" type="checkbox"/> solid <input type="checkbox"/> liquid <input type="checkbox"/> semi solid	Turbidity: <input type="checkbox"/> clear <input type="checkbox"/> cloudy <input type="checkbox"/> opaque	Vis				
Lvr 2: <input type="checkbox"/> solid <input type="checkbox"/> liquid <input type="checkbox"/> semi solid	Turbidity: <input type="checkbox"/> clear <input type="checkbox"/> cloudy <input type="checkbox"/> opaque	Vis				
Water Mix	WMIX	ASTM D5056-80				
Lvr 1: <input type="checkbox"/> soluble <input type="checkbox"/> partial <input type="checkbox"/> insoluble	<input type="checkbox"/> sinks <input type="checkbox"/> floats	Rea				
Lvr 2: <input type="checkbox"/> soluble <input type="checkbox"/> partial <input type="checkbox"/> insoluble	<input type="checkbox"/> sinks <input type="checkbox"/> floats	Rea				
pH - Paper	pHPA	ASTM D4980-89		SU (lyr 1)		
Oxidizer Screen	OX-S	ASTM D4981-89				
Flammability Potential	IGN	ASTM D4982-89	<input checked="" type="checkbox"/> negative <input type="checkbox"/> positive (lyr 1)			
Radio Activity Screen	RAD	CWM 92-36				
Sulfides Screen	S-S	ASTM D4978-89	25 ppm			
Cyanides - Prussian	CN-SP	ASTM D5049-90	30 ppm			
Cyanides - Cyanosmo	CN-SC	ASTM D5049-90	10 ppm			
Paint Filter Test	OPFT	SW846 9095	<input type="checkbox"/> pass <input type="checkbox"/> fail			
Flashpoint-Closed Cup	FPC	SW846 1010		*F (lyr 1)		
pH by Meter	pH	ASTM D4980-89		SU (lyr 1)	SU (lyr 2)	
Sulfides - Dissolved	S-DIS	CWM 85-31	25 ppm			
PCBs:	PCB	SW846 8082	Aroclor 1016	_____ ppm		
			Aroclor 1221	_____ ppm		
			Aroclor 1232	_____ ppm		
			Aroclor 1242	_____ ppm		
			Aroclor 1248	_____ ppm		
			Aroclor 1264	_____ ppm		
			Aroclor 1260	_____ ppm		
Metals:						
Arsenic	AS(-T)	SW846 1311	0.35mg/L	0.48 mg/L	<input checked="" type="checkbox"/> Tcdp <input type="checkbox"/> Totals (minus Hg)	
Barium	BA(-T)	SW846 1311	0.33mg/L	<0.28 mg/L	BB	1/4/2007
Cadmium	CD(-T)	SW846 1311	0.09mg/L	<0.08 mg/L		
Chromium	CR(-T)	SW846 1311	0.39mg/L	<0.39 mg/L		
Copper	CU(-T)	SW846 1311	0.37mg/L	0.8 mg/L		
Lead	PB(-T)	SW846 1311	0.36mg/L	2.18 mg/L		
Mercury	HG(-T)	SW846 7470	2.3µg/L	<2.3 µg/L	<input checked="" type="checkbox"/> Tcdp <input type="checkbox"/> Totals (Hg only)	
Nickel	NI(-T)	SW846 1311	0.16mg/L	<0.16 mg/L	BB	1/9/2007
Selenium	SE(-T)	SW846 1311	0.58mg/L	<0.58 mg/L		
Silver	AG(-T)	SW846 1311	0.17mg/L	<0.17 mg/L		
Zinc	ZN(-T)	SW846 1311	0.15mg/L	48.3 mg/L		

COMMENTS: FOUNDRY SAND

CERTIFICATION: Except as explicitly noted, all analytical data reported below were obtained under my direction and supervision. For Veolia Environmental Services companies, sample preparation and analytical methods and analytical equipment specified or approved in the facility's waste analysis plan were used in conducting this analysis. This laboratory follows a quality assurance control program.

SIGNATURE: \_\_\_\_\_

Name: Bill Banks (or other designated person)

Date: \_\_\_\_\_

1-9-07



# PURCHASE ORDER



## INVOICE TO:

Loveland Office  
2915 Rocky Mountain Ave.  
Suite 400  
Loveland CO 80538-9048

Phone: ( ) -  
Fax: ( ) -

Order Number:	363244
Order Date:	April 03, 2014
Required Date:	April 03, 2014
Buyer:	Shirley Achtemeier
For:	41 -
Sales Order:	
Cust PO#:	

Supplier: FALL RIVER FOUNDRY CO.  
P.O. BOX 38  
FALL RIVER WI 53932-

Deliver To: Fairbury NE Micros  
56906 Hwy 8  
Fairbury NE 68352-

Phone: (920) 484-3311  
Fax: ( ) -

Phone:  
Fax:

Vendor Code	Vendor GST #	Terms	FOB	Ship Via
FALRIV		NET 30 DAYS		

Lin	Part Code	Wh	Order Quantity	Uom	Purchase Price	Uom	Line Value	Extended Value
1	54343 BRASS MILL FUME Weight: 34,000.00 LBS	41	34,000.00	LBS	0.1827	LBS	6,211.80	6,211.80
One load of zinc oxide delivered to Fairbury at \$.1827 per pound. SDS and C of A required with load. Contact 402-729-6191 ext. 1010 regarding delivery.								

Total Weight:	34,000.00	LBS	Line Totals	6,211.80
			Landed Cost	0.00
			Discount	0.00
			Freight	0.00
			Misc	
			Tax	0.00
			Total Order (US)	\$6,211.80

## Comments:

By providing all acceptance of this PO is not issued, stated at <http://www.agrium.com> payments to Vendor shipping papers, Agrium Advanced

#14

This Purchase Order ("PO"), Vendor is indicating its alteration or addition. If this PO is issued pursuant to a terms and conditions as stated in that agreement. If this PO is subject to the terms and conditions as stated in that agreement. Please review pricing for each item as all quantities change, a new PO will have to be issued by 3074 if there are any discrepancies or changes.

NOTE: Any change

approved prior to shipping.

Page 1 of 1

No. 1621 P. 17

Sep. 30. 2014 2:30PM

is an acknowledgement that a Bill of Lading has been issued and is not the Original Bill of Lading, nor **43835**  
This Memorandum a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

BADEX EXPRESS  
(Name of Carrier)

Shipper's No. \_\_\_\_\_  
Carrier's No. \_\_\_\_\_

RECEIVED, subject to the classifications and tariffs in effect on the date of the receipt by the carrier of the property described in the Original Bill of Lading.

**FALL RIVER FOUNDRY**

at **Fall River, WI** 20-484-3311 4-4-20 14 From **670 S. Main**

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classifications in effect on the date hereof, if this is a rail or a self-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to FALL RIVER FOUNDRY NE MICHIGAN

(Mail or street address of consignee - For purposes of notification only)

Destination FALL RIVER State NEB County \_\_\_\_\_

Delivery Address \*

(\* To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route SEAGRAM HAWK 108352

Delivery Carrier BADEX EXPRESS

Car or Vehicle Initials #1223

No. \_\_\_\_\_

No. Packages	Kind of Package, Description of Articles, Special Marks, and Exceptions	WEIGHT (Subject to Correction)	Class or Rate	Check Column	Subject to Section 7 of Conditions of applicable Bill of Lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignor) If charges are to be prepaid, write or stamp here: "To be Prepaid". Received \$ _____ to apply in payment of the charges on the property described herein. Agent or Cashier Per _____ (The signature here acknowledges only the amount prepaid.) Charges Advanced: \$ _____ † Shipper's imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission.
	<u>28 PALLETS</u>	<u>21,751</u>			
	<u>ZINC OXIDE</u>	<u>2234</u>			
	<u>P.O.# 363244</u>	<u>24,517</u>			
	<u>SEAL # 72-47758</u>				

\*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

†The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of the Consolidated Freight Classification.

**FALL RIVER FOUNDRY**

Shipper, per 12-1-20

12-1-20 Agent, Per \_\_\_\_\_

Permanent post-office address of shipper, **Fall River, Wisconsin 53932**

REPORT Fall River 2013-11

Vendor: **Fall River Foundry**  
 Document #  
 Vendor Code: FALRIV  
 Invoice Date: 08/28/13  
 Due Date: 10/12/13  
 GRN#: 405999  
 Type: 21FMI

PURCHASE ORDER: 355592  
 SETTLEMENT DATE: 9/3/2013  
 DATE SHIPPED: 8/24/2013  
 BOL NO.: 43818  
 GROSS WEIGHT: 30,702  
 TARE WEIGHT: 2,670  
 NET WEIGHT: 28,032  
 DATE REC'D: 8/28/2013  
 LME PRIOR MO. AVERAGE: 83.2700  
 CONTRACT %: 20  
 PREPARED BY: SEA  
 INVOICE NUMBER: 43818

**Agrium Advanced Technologies**

56906 Hwy 8  
 FAIRBURY, NE 68352

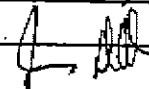
**PURCHASE SETTLEMENT AGREEMENT**

MATERIAL	GROSS WEIGHT	DUNNAGE	MOISTURE CONTENT (%)	MOISTURE DEDUCTIONS	CLEAN DRY WEIGHT	METAL ASSAY %	METAL CONTENT LBS.	QUOTATION PER METAL CONTENT	TOTAL
ZINC OXIDE	28,032		1.76	493	27,539	61.75%	17,005	\$0.1665	\$2,832.01
NET DUE									\$2,832.01

SEP 10 2013  
 BY: \_\_\_\_\_

492126

9/4/2013 12:09 PM

Vendor ID: \_\_\_\_\_  
 Account #: 25-07-00-41-56-  
 GRN #: 405999  
 Approval: 

is an acknowledgement that a Bill of Lading has been issued and is not the Original Bill of Lading, nor **43818**  
 This Memorandum a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

*BGP TRANSPORTATION*

Shipper's No. \_\_\_\_\_  
 Carrier's No. \_\_\_\_\_

(Name of Carrier)

RECEIVED, subject to the classifications and tariffs in effect on the date of the receipt by the carrier of the property described in the Original Bill of Lading.

**FALL RIVER FOUNDRY**

at **Fall River, WI**

*8-24-20 13*

From

**670 S. Main**

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination, it is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all terms and conditions of the Uniform Domestic Freight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classification in effect on the date hereof, if this is a rail or a joint-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.  
 Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to *FAIRPLAY-NE MILWAU*

Destination *FAIRPLAY* State *NEB* County \_\_\_\_\_ Delivery Address ★ \_\_\_\_\_  
 (★ To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route *56106-HUM 8 18352*

Delivery Carrier *BGP TRANSPORTATION* Car or Vehicle Initials \_\_\_\_\_ No. \_\_\_\_\_

No. Packages	Kind of Package, Description of Articles, Special Marks, and Exceptions	*WEIGHT (Subject to Correction)	Class or Rate	Check Column	Subject to Section 7 of Conditions of applicable Bill of Lading. If this shipment is to be delivered to the consignee without recourse on the nonshipper, the consignee shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. (Signature of Consignee) If charges are to be prepaid, write or stamp here: "To be Prepaid". Received \$ _____ to apply in prepayment of the charges on the property described herein. Agent or Cashier Per _____ (The signature here acknowledges only the amount prepaid.) Charges Advanced: _____ † Shipper's imprint in Blue of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission.
	<i>30 BAGS</i>	<i>30712</i>			
	<i>7 INCOVINE</i>	<i>2167</i>			
	<i>P.O. # 355512</i>	<i>28032</i>			
	<i>SEALED-224/7771</i>				

\*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.  
 Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.  
 The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \_\_\_\_\_ per \_\_\_\_\_

†The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of the Consolidated Freight Classification.

**FALL RIVER FOUNDRY**

Shipper, per *[Signature]*

Agent, Per \_\_\_\_\_

Permanent post-office address of shipper, **Fall River, Wisconsin 53932**

**3**

# PURCHASE ORDER


**INVOICE TO:**

Loveland Office  
2915 Rocky Mountain Ave.  
Suite 400  
Loveland CO 80538-9046

Phone: ( ) -  
Fax: ( ) -

Order Number:	355592
Order Date:	August 13, 2013
Required Date:	August 13, 2013
Buyer:	Shirley Achtemeier
For:	41 -
Sales Order:	
Cust PO#:	

Supplier: FALL RIVER FOUNDRY CO.  
P.O. BOX 38  
FALL RIVER WI 53932-

Deliver To: Fairbury NE Micros  
56906 Hwy 8  
Fairbury NE 68352-

Phone: (920) 484-3311  
Fax: ( ) -

Phone:  
Fax:

Vendor Code	Vendor GST #	Terms	FOB	Ship Via
FALRIV		NET 30 DAYS		

Lin	Part Code	Wh	Order Quantity	Uom	Purchase Price	Uom	Line Value	Extended Value
1	54343 BRASS MILL FUME Weight: 30,000.00 LBS	41	30,000.00	LBS	0.1100	LBS	3,300.00	3,300.00
One load of zinc oxide delivered to Fairbury. Weight may vary and price will be based on percentage of zinc contained at 20% of previous month's LME. MSDS and C of A required. Contact Beck at 402-729-6191 ext. 1014 regarding delivery.								

Comments:	Total Weight:	30,000.00	LBS	Line Totals	3,300.00
				Discount	0.00
				Freight	0.00
				Misc	0.00
				Tax	0.00
				Total Order (US)	\$3,300.00

By providing all or any part of the Goods and/or Services described in this Purchase Order ("PO"), Vendor is indicating its acceptance of this PO and agrees to be bound by all of its terms, without alteration or addition. If this PO is issued pursuant to a fully executed agreement between the parties, this PO is subject to the terms and conditions as stated in that agreement. If this PO is not issued pursuant to a fully executed agreement between the parties, this PO is subject to the terms and conditions as stated at [http://www.agriumaticom/purchasing\\_terms\\_and\\_conditions.jsp](http://www.agriumaticom/purchasing_terms_and_conditions.jsp). Please review pricing for each item as all payments to Vendor are based on this PO. To ensure prompt payment, please reference PO number above on all invoices, shipping papers, packages and correspondence. Should pricing, terms or quantities change, a new PO will have to be issued by

NOTE: Any changes to this order either in quantities or price must be approved prior to shipping.

Page 1 of 1

No. 1621 P. 21

Sep. 30. 2014 2:31PM

REPORT Fall River 2012-09

#14

Vendor: **Fall River Foundry**  
 Document #  
 Vendor Code: FALRIV  
 Invoice Date: 06/25/12  
 Due Date: 08/09/12  
 GRN#: 378703  
 Type: 21FMI

PURCHASE ORDER	342657
SETTLEMENT DATE	7/5/2012
DATE REC'D	7/2/2012
BOL NO.	43690
GROSS WEIGHT	35,062
TARE WEIGHT	2,670
NET WEIGHT	32,392
DATE REC'D	7/2/2012
LME PRIOR MO. AVERAGE	87.5443
CONTRACT %	20
PREPARED BY	SEA
INVOICE NUMBER	43690

**Agrium Advanced Technologies**

55906 Hwy 8  
 FAIRBURY, NE 68352

**PURCHASE SETTLEMENT AGREEMENT**

MATERIAL	GROSS WEIGHT	DUNNAGE	MOISTURE CONTENT (%)	MOISTURE DEDUCTIONS	CLEAN DRY WEIGHT	METAL ASSAY %	METAL CONTENT LBS.	QUOTATION PER METAL CONTENT	TOTAL
ZINC OXIDE	32,392		1.25	405	31,987	69.71%	22,298	\$0.1751	\$3,904.13
NET DUE									\$3,904.13

7/9/2012 8:08 AM

Sep. 30. 2014 2:31PM

No. 1621 P. 22

## Straight Billing of Lading - Short Form

43690

ORIGINAL - NOT NEGOTIABLE

BADGER CUSTOM PAINT

Shipper's No. \_\_\_\_\_

Carrier's No. \_\_\_\_\_

(Name of Carrier)

RECEIVED, subject to the classifications and tariffs in effect on the date of the receipt by the carrier of the property described in the Original Bill of Lading.

FALL RIVER FOUNDRY

at Fall River, WI 20-484-3311-6-2820 12

From

670 S. Main

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract agrees to carry to its usual place of delivery at said destination, if on the route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Circular, Formers, Woodens and Illinois Freight Classification in effect on the date hereof, (2) in a rail or a motor carrier shipment, or (3) in the applicable motor carrier classification or tariff in this to a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to AGRIUM ADVANCED TECHNOLOGIES - FAIRBURY NE WAREHOUSEDestination FAIRBURY State NE County \_\_\_\_\_ Delivery Address \* \_\_\_\_\_Route 56906 Hwy 8 68352 (\* To be filled in only when shipper desires and governing tariffs provide for delivery through)Delivery Carrier BADGER CUSTOM PAINT Car or Vehicle Initials 2024 No. \_\_\_\_\_

No. Packages	Kind of Package, Description of Articles, Special Marks, and Exceptions	WEIGHT (Subject to Correction)	Class or Rate	Check Column	Subject to Section 7 of Conditions of applicable Bill of Lading, if this shipment is to be delivered to the consignee through a warehouse, the consignee shall also be responsible for the payment of the charges on the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
<u>30</u>	<u>30 PAINTS</u>	<u>35.062</u>			(Signature of Consignor)
	<u>ZINC OXIDE</u>	<u>2670</u>			If charges are to be prepaid, write or stamp here: "To Be Prepaid"
	<u>P.O. # 342657</u>	<u>32,392</u>			Received (to apply in payment of the charges on the property in transit of carrier)
	<u>Contact Int. Becky Beasley 402-729-6191-EXT 1014</u>				Agent or Carrier
	<u>SEA-NO-7247704</u>				(The signature here acknowledges only the amount prepaid)
If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. Note: Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____					Charges Advanced
The above boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of the Consolidated Freight Classification.					Shipper's imprint in line of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission.

Shipper, per Mark F. SLC Agent, Per \_\_\_\_\_Permanent post-office address of shipper, Fall River, Wisconsin 53932

dan

From: helpdesk@epacdx.net  
Sent: Monday, February 06, 2012 2:08 PM  
To: dan@fallrivergroup.com; brennen@fallrivergroup.com  
Subject: TRI-MEweb Submission Certification

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to USEPA.

Please be aware that the state of WISCONSIN is participating in USEPA's TRI Data Exchange through the Environmental Information Exchange Network. This certified submission will be electronically forwarded to WISCONSIN, satisfying your obligation to report to both USEPA and the state in which the facility is located ( WISCONSIN ).

You may wish to print a copy of this receipt and keep it for your records. Do not send this receipt to USEPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

----- REFERENCE INFORMATION -----

TRI Facility ID: 53932FLLRV670SO  
Facility: FALL RIVER FOUNDRY CO  
670 S MAIN ST  
FALL RIVER WISCONSIN, 53932

Chemical Name	RY	CAS	Form	Revision	
Withdrawal					
Benzene	2011	71432	R	No	No
Lead	2011	7439921	R	No	No
Zinc (fume or dust)	2011	7440666	R	No	No
Copper	2011	7440508	R	No	No

Prepared By: dan@fallrivergroup.com  
Date Prepared: Feb 6, 2012 2:52:38 PM  
Certifying Official:  
Name: BRENNEN WEIGEL  
Title: PRESIDENT  
E-mail: brennen@fallrivergroup.com  
Date Certified and Sent to USEPA: Feb 6, 2012 3:07:30 PM Transaction ID: \_43e734b6-a39a-4dd3-a0b1-763e074d67bb  
Document Name: TRI000220120206145236FALLRIVERDAN

----- CDX HELP DESK -----

Phone (toll-free): +1 (888) 890-1995  
Phone (toll): (970) 494-5500  
Email: helpdesk@epacdx.net  
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: <https://cdx.epa.gov/>



dan

From: helpdesk@epacdx.net  
Sent: Wednesday, June 04, 2014 2:30 PM  
To: dan@fallrivergroup.com; brennen@fallrivergroup.com  
Subject: TRI-MEweb Submission Certification

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to USEPA.

Please be aware that the state of WISCONSIN is participating in USEPA's TRI Data Exchange through the Environmental Information Exchange Network. This certified submission will be electronically forwarded to WISCONSIN, satisfying your obligation to report to both USEPA and the state in which the facility is located ( WISCONSIN ).

You may wish to print a copy of this receipt and keep it for your records. Do not send this receipt to USEPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

----- REFERENCE INFORMATION -----

TRI Facility ID: 53932FLLRV67030  
Facility: FALL RIVER FOUNDRY CO  
670 S MAIN ST  
FALL RIVER WISCONSIN, 53932

Chemical Name	RY	CAS	Form	Revision	
Withdrawal					
Zinc (fume or dust)	2013	7440666	R	No	No
Benzene	2013	71432	R	No	No
Copper	2013	7440508	R	No	No
Lead	2013	7439921	R	No	No

Prepared By: dan@fallrivergroup.com  
Date Prepared: Jun 4, 2014 12:38:22 PM  
Certifying Official:  
Name: BRENNEN WEIGEL  
Title: CEO  
E-mail: brennen@fallrivergroup.com  
Date Certified and Sent to USEPA: Jun 4, 2014 3:30:26 PM Transaction ID: 39710012-2af1-428b-912b-f64b71eeab0d  
Document Name: TRI000220140604123822FALLRIVERDAN

----- CDX HELP DESK -----

Phone (toll-free): +1 (888) 890-1995  
Phone (toll): (970) 494-5500  
Email: helpdesk@epacdx.net  
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.  
Access CDX Home: <https://cdx.epa.gov/>

dan

From: helpdesk@epacdx.net  
Sent: Thursday, June 20, 2013 2:05 PM  
To: dan@fallrivergroup.com; brennen@fallrivergroup.com  
Subject: TRI-MEweb Submission Certification

The TRI-MEweb submission for the facility and chemical(s) listed below has been prepared, certified, and sent to USEPA.

Please be aware that the state of WISCONSIN is participating in USEPA's TRI Data Exchange through the Environmental Information Exchange Network. This certified submission will be electronically forwarded to WISCONSIN, satisfying your obligation to report to both USEPA and the state in which the facility is located ( WISCONSIN ).

You may wish to print a copy of this receipt and keep it for your records. Do not send this receipt to USEPA.

If you have any questions regarding this email, please contact the CDX Help Desk at the phone numbers listed below for further assistance. Please reference the information below when contacting the CDX Help Desk.

----- REFERENCE INFORMATION -----

TRI Facility ID: 53932FLLRV670SO  
Facility: FALL RIVER FOUNDRY CO  
670 S MAIN ST  
FALL RIVER WISCONSIN, 53932

Chemical Name	RY	CAS	Form	Revision	
Withdrawal					
Benzene	2012	71432	R	No	No
Lead	2012	7439921	R	No	No
Zinc (fume or dust)	2012	7440666	R	No	No
Copper	2012	7440508	R	No	No

Prepared By: dan@fallrivergroup.com  
Date Prepared: May 9, 2013 12:44:29 PM  
Certifying Official:  
Name: BRENNEN WEIGEL  
Title: CEO  
E-mail: brennen@fallrivergroup.com  
Date Certified and Sent to USEPA: Jun 20, 2013 3:05:19 PM Transaction ID:  
\_dc44da41-462e-4a02-9fa8-b63f0ca9e8d3  
Document Name: TRI000220130509124429FALLRIVERDAN

----- CDX HELP DESK -----

Phone (toll-free): +1 (888) 890-1995  
Phone (toll): (970) 494-5500  
Email: helpdesk@epacdx.net  
The CDX Help Desk is available Monday through Friday, 8:00 AM to 6:00 PM Eastern Time.

Access CDX Home: <https://cdx.epa.gov/>

**Whitney, Brenda**

---

**From:** Dan Weinberger <dan@fallrivergroup.com>  
**Sent:** Thursday, October 02, 2014 1:40 PM  
**To:** Whitney, Brenda  
**Subject:** RE: WASTE SAND TCLP

WE WILL BE SENDING OUT ONE SAMPLE AS ALL WASTE SAND COMES FROM THE MOLDING PROCESS. I DON'T KNOW THE TIME FRAME FOR RESULTS BUT WILL SHARE THEM ASAP.

-----Original Message-----

**From:** Whitney, Brenda [mailto:whitney.brenda@epa.gov]  
**Sent:** Thursday, October 02, 2014 9:02 AM  
**To:** Dan Weinberger  
**Subject:** RE:

That would be much appreciated. If you could do multiple samples from different sources prior to treatment, that would be ideal. But I do understand if you just want to do one sample.

You do not need to sample the material, however, if you can provide sufficient documentation to support your determination that the waste is (or is not) hazardous. I do not know what would be easier for you. I know it would be clearer for me to see actual numbers.

Let me know what you decide.

Thanks!  
Brenda

-----Original Message-----

**From:** Dan Weinberger [mailto:dan@fallrivergroup.com]  
**Sent:** Thursday, October 02, 2014 8:07 AM  
**To:** Whitney, Brenda  
**Subject:** RE:

I DON'T HAVE THAT.BUT COULD SEND OUT FOR A TCLP?

-----Original Message-----

**From:** Whitney, Brenda [mailto:whitney.brenda@epa.gov]  
**Sent:** Wednesday, October 01, 2014 1:59 PM  
**To:** Dan Weinberger  
**Subject:** RE:

Hi Dan,

I am requesting one more bit of information from you.

If available, please provide analytical TCLP results of your UNTREATED waste sand.

Thanks!

Brenda

---

Brenda Whitney  
Environmental Engineer  
U.S. EPA - Region 5  
77 W. Jackson Boulevard, LR-8J  
Chicago, Illinois 60604

312-353-4796 (ph)  
312-385-5505 (fax)



# BADGER LABORATORIES & ENGINEERING INC.

501 WEST BELL STREET • NEENAH, WISCONSIN 54956-4668 • EST. 1966  
(920) 729-1100 • FAX (920) 729-4945 • 1-800-776-7196

FALL RIVER FOUNDRY COMPANY  
670 SOUTH MAIN STREET  
FALL RIVER, WI 53932

Report Number: 1409924  
Report Date: 10/22/2014  
Sampled By: Client  
Emailed: 10/22/2014

Attn: MR. DAN WEINBERGER

# Samples: 2

Sample Number: 44023767  
Description: #1  
Sample Date:  
Date Received: 10/6/2014

Parameter	Results	Units	Flags	LOD	LOQ	Method	Analyzed	Init.
METALS DIGESTION	DONE			0	0	EPA200.2	10/9/2014	CB
TCLP ARSENIC	<0.008	mg/l		0.008	0.027	SM3113B	10/15/2014	CB
TCLP BARIUM	0.36	mg/l		0.05	0.11	SM3111D	10/16/2014	CB
TCLP CADMIUM	<0.01	mg/l		0.01	0.02	SM3111B	10/14/2014	CB
TCLP CHROMIUM	<0.03	mg/l		0.03	0.10	SM3111B	10/14/2014	CB
TCLP COPPER	1.0	mg/l		0.01	0.02	SM3111B	10/13/2014	CB
TCLP EXTRACTION	COMPLETE			0	0	SW846-1311	10/7/2014	JV
TCLP LEAD	0.64	mg/l		0.03	0.10	SM3113B	10/14/2014	CB
TCLP MERCURY	<0.0002	mg/l		0.0002	0.0008	SM3112B	10/20/2014	JV
TCLP NICKEL	<0.02	mg/l		0.02	0.05	SM3113B	10/13/2014	CB
TCLP SELENIUM	<0.006	mg/l		0.006	0.020	SM3113B	10/16/2014	CB
TCLP SILVER	<0.01	mg/l		0.01	0.03	SM3113B	10/14/2014	CB
TCLP ZINC	33	mg/l		1.3	4.3	SM3111B	10/13/2014	CB

WI DNR Certified Lab #445023150  
WI Reg. Engineers (Corp.) #CE00601  
WI DATCP Certified #205 (Bacteria-Water)

Members  
WI Environmental Labs; Am. Chemical Soc.;  
T.A.P.P.I.; WI Food Processors Assn.;  
Wisc. Paper Council

